STIPULATION TO EXTEND DEADLINE TO RESPOND TO MOTION TO DISMISS

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

28

PROCEDURAL BACKGROUND

- 1. On February 9, 2018, Plaintiff filed its Motion to Dismiss. Per the Court's February 21, 2018 Minute Order (ECF No. 121), Defendant's response is due by February 26, 2018.
- 2. The Plaintiff and Defendant now hereby stipulate to extend the deadline for the Defendant to respond to the Motion to Dismiss to Monday, March 12, 2018.
- 3. This is the <u>Second Request</u> for an extension of this deadline; the parties submitted a stipulation yesterday with an identical request (ECF No. 122); however, the Court denied the request <u>without prejudice</u>, because it had been submitted concurrently in the same filing as a request to extend another briefing deadline.
 - 4. This request is made in good faith and not made for the purpose of undue delay.

GOOD CAUSE STATEMENTS

5. Defendant seeks additional time to respond to the Motion to Dismiss, noting that Defendant's lead counsel, Lisa Clay, Esq., was on a pre-planned vacation out of the country at the time of the filing of the Motion to Dismiss and will not return until February 15, 2018. Based on Counsel will need additional time to review the Motion to Dismiss and craft an Opposition.

/// 18 19 /// 20 /// 21 /// 22 /// 23 /// 24 /// 25 /// 26 /// 27 ///

///

1	WHEREFORE, subject to the Court's approval below, Plaintiff LHF PRODUCTIONS,
2	INC. and Defendant BRIAN KABALA hereby stipulate and agree to extend the deadline for the
3	Defendant to respond to the Motion to Dismiss from Monday, February 26, 2018 to Monday,
4	March 12, 2018, and Plaintiff's deadline to file its Reply brief be similarly extended.
5	Respectfully submitted February 14, 2018
6	
7	HAMRICK & EVANS LLP KOLESAR & LATHAM
8	/s/ Charles C. Rainey
9	CHARLES C. RAINEY, ESQ. Nevada Bar No. 10723 JONATHAN D. BLUM, ESQ. Nevada Bar No. 9515
10	crainey@hamricklaw.com jblum@klnevada.com 7670 W. Lake Mead Blvd., Ste. 140 400 S. Rampart Blvd., Ste. 400
11	Las Vegas, Nevada 89128 Lås Vegas, Nevada 89145 +1.702.425.5100 (ph) +1.702.362.7800 (ph)
12	Attorney for Plaintiff, Attorney for Defendant, LHF Productions, Inc. Brian Kabala
13	<u>ORDER</u>
14	Based on the parties' stipulation [ECF No. 125] and good cause appearing, IT IS HEREBY
15	ORDERED that the deadline for the Defendant to respond to the Plaintiff's pending Motion to
16	Dismiss is hereby extended to Monday, March 12, 2018, and Plaintiff's deadline to file its Reply
17	brief is hereby similarly extended.
18	IT IS SO ORDERED.
19	Dated: February 21, 2018.
20	
21	NO Sec
22	UNITED STATES DISTRICT JUDGE
23	
24	
25	
26	
27	
28	